

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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COMMUNICATIONS

In the Matter of )  
 )  
Amendment of The Commission's ) RM-8499  
Rules to Establish a New Radio )  
Service. )

To: The Commission

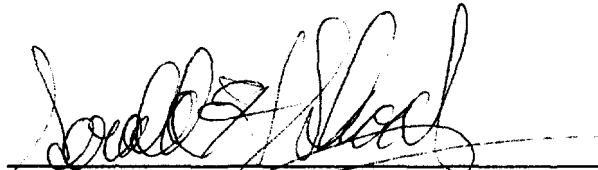
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REPLY COMMENTS OF SUBURBAN REACT 3410

to Comments on a  
PETITION FOR RULE MAKING

submitted by

TANDY CORPORATION



Gerald H. Shoaf, President  
Suburban REACT 3410  
P.O. Box 213  
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September 8, 1994

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EWNS9/8/94  
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## EXECUTIVE SUMMARY

Suburban REACT wishes to strongly and formally disagree with the position advanced by Motorola, Inc. in its comments to RM-8499. While Motorola does have a successful track record in the design, manufacture and sale of two-way radio equipment as it boasts in its comments, it would almost appear that Motorola does not have the necessary operational experience to comment on the instant proposal.

Suburban REACT does agree with the positions advanced by REACT International, Inc. with regard to 1) the need for additional, low cost communications capabilities for the general public and 2) licensing and licensing fees in the GMRS. There are needs for high quality, low cost communications capabilities; however, many of these can be met by the introduction of new technologies to existing services, and through proper design of future services. Suburban REACT also feels that licensing should be retained, but that provision should be made to provide for more modest fees than are now currently required.

## DISCUSSION

I. BACKGROUND

Tandy Corporation, and its Radio Shack retail sales division, has proposed that the Commission create a new Family Radio Service ("FRS") within and along-side the General Mobile Radio Service ("GMRS"). A number of entities, including Motorola, Inc., have filed comments in this matter. Motorola submitted a "Statement of Support", suggesting that organizations such as Suburban REACT would benefit from the proposed FRS. REACT International supported the FRS concept, but argued that the proposal to place

the unlicensed FRS on the same frequencies would lead to overcrowding and chaos on GMRS.

The following Reply Comments will focus on comments filed by Motorola Inc. and REACT International, Inc., as well as the underlying proposal by Tandy Corporation.

## II. STATEMENT OF INTEREST OF SUBURBAN REACT 3410

Suburban REACT 3410 is a chartered member Team of REACT International, Inc. Its members live and work in the western sections of Philadelphia as well as the west and northwest Philadelphia suburbs of Delaware and Montgomery Counties in Pennsylvania.

The volunteers of Suburban REACT provide service to their communities through sponsorship of a number of Team programs, including:

- ♦ Community Watch Program -- members of Suburban REACT's "REACT Patrol" serve the Philadelphia communities of Overbrook and Overbrook Park, an area of approximately one square mile (seven blocks by seven blocks). Twenty-Five Patrol participants invested over 2000 person-hours in calendar year 1993 working to reduce crime and improve safety. Over 6000 miles were logged by patrol members during 1993 in their own automobiles and at their own expense. Additional mileage was invested by members performing foot-patrol. Please see Attachment I which summarizes hours invested, and Attachment II which summarizes automobile miles logged. REACT Patrol and its members have received countless awards and commendations for service to the local community. Please see Attachment III for a copy of the most recent Official Commendation.

- ♦ CB Channel 9 Monitoring -- Team members have invested tens of thousands of hours and logged thousands of calls assisting motorists reporting emergency situations, needing mechanical assistance or local or highway information and directions.
- ♦ Field Events -- Team members work with local community activities, such as Special Olympics, March of Dimes "WalkAmerica" walk-a-thon, parades, and other field events. These activities provide valuable field experience in preparation for response to disaster situations such as providing emergency communications assistance to the Red Cross or Salvation Army.
- ♦ Traffic Reporting -- Team members, being radio equipped, use their capabilities to speed the response of emergency personnel and reduce traffic congestion through notification of local highway information services.
- ♦ GMRS -- The Team sponsors a General Mobile Radio Service repeater, as well as operator training and equipment maintenance, to support the other Team programs. Because of the integral role of radio communications in the Team's various programs, GMRS system development, training and maintenance is identified as a separate, interrelated Team program.

Members use a variety of radio systems in these activities, including:

- ♦ The General Mobile Radio Service (GMRS)
- ♦ The Citizens Band Radio Service (CB)
- ♦ Cellular Radio Telephone
- ♦ The Amateur Radio Service (ARS)

As is evidenced in the foregoing statement, Suburban REACT 3410 is the type of organization cited by Tandy Corporation in its Petition for Rule Making as one of the potential benefactors of the proposed Family Radio Service (FRS).

### III. THE FRS WOULD PROVIDE A FALSE SENSE OF PRIVACY

In its Comments, Motorola would have the reader believe that the FRS would provide for "...selective (i.e. private) conversations." The nature of this comment would suggest that Motorola does not understand that selective conversations do not imply privacy. In its proposal "Tandy anticipates that FRS units will be available in a variety of configurations, including features such as private channel calling via CTCSS, priority channel calling, channel scan etc. More advanced units may include such features as programmable tone-coded ID numbers that can be used to access individuals or groups of users" (Proposal by Tandy Corporation at page 6). Nowhere is there a statement that conversations would be truly private, nor does Tandy advocate a standardize protocol for selective calling.

The implied traits to Motorola's "Private Line" trademark notwithstanding, the FRS, as proposed, would not offer any measure of privacy as the reader might be lead to believe. On the contrary, what little measure of privacy that is now enjoyed by users of the GMRS, such as town watch organizations, would be lost if manufacturers such as Radio Shack or Motorola flood the market with millions of low cost, low quality radios that can be operated without benefit of automatic trunking and rules compliance through equipment design. In addition, the GMRS channels can be (and in fact are) monitored through use of thousands of scanners both in the marketplace and in the public's hands.

Any suggestion of privacy in product literature would have to be considered false and deceptive advertising.

Not only would the service offer limited privacy, the presence of thousands of units, all operating within a limited channel space and suffering from equipment that promotes violation of the Commission's rules, would be a prescription for anarchy. For example, radios currently designed and sold by Motorola allow the user to transmit, and to carry on a conversation, without the benefit of equipment design that requires the monitoring of the channel carrier access. Motorola's "Private Line" trademark actually encourages the user to think that he/she is truly on a private channel, allowing operation without regard to others who are co-channel users. This scenario is acceptable in a coordinated service where there is control exerted by central body such as a coordinator and repeater owner; in an uncoordinated service, such as the GMRS (or a FRS) this is an express lane to chaos.

#### IV. THE FRS WOULD NOT PROVIDE THE RANGE ALLEGED -- BUT WOULD PROVIDE A FALSE SENSE OF SECURITY

In its comments Motorola states:

Hunters and fisherman would be able to monitor the location of their companions and better coordinate rendezvous points. During camping trips, parents would be able to allow their children to wander without fear of losing contact. Indeed, the service would provide a greater measure of safety to outdoor hobbyists.

This statement is simply not true; on the contrary, a false sense of security would be projected, causing the increased chance of tragedy.

It is Suburban REACT's operational experience using both low power, person carried units and higher powered, mobile units that the single frequency, radio to radio "simplex" range at 462 MHz is extremely limited in all environments -- urban, suburban and rural. While talking mountain-top to mountain-top, or tall building to tall building, the range of a low-powered GMRS unit can be many miles, in actual practice the range is more on the order of less than a mile. For example, Suburban REACT's townwatch activities encompass approximately one square mile. A member carrying both a cellular telephone and a GMRS unit can serve as a "mobile base", serving as the point of contact between other members on patrol and the Philadelphia Police Department. This allows us to put an additional member "on the street" to act as an extra set of eyes and ears watching the community. However, because of the limited range at 462 MHz, a member on one side of the patrol area can not communicate with another member on the opposite side without aid of a repeater. Thus, we are routinely faced with making one of two choices:

- ♦ Take a member "off the street" to staff our base station, where the centrally located antenna can hear all members.
- ♦ Operate on the Team's GMRS Repeater, which both ties up the GMRS channel over the entire City of Philadelphia (so to provide protection to a single community) and reduces privacy.

The key factor in range is antenna location -- it is not operating power.

It is our fear that families using FRS radios will develop a false sense of security, leading to an emergency situation where one, or more members become lost due to the limited range of the radios.

The members of Suburban REACT have participated in numerous searches for lost family members. While we are prepared to serve at a moment's notice to respond to such an emergency, we would prefer that we are not faced with such an occurrence as a result of overzealous marketing efforts of underperforming radio equipment.

From reading Tandy's proposal, and Motorola's comments, it would almost appear that neither Motorola nor Tandy have the operational experience using low powered, person carried radios enjoyed by the Suburban REACT membership. The tests performed by Tandy in Texas and Florida fail to simulate the widely varying geographic terrain a family should expect to encounter in urban, rural and suburban environments. Tandy's experiments presented only the most ideal conditions for use of low power, person carried UHF units.

In this regard, Paul Schultz, our Director for patrol operations, invites the management and technical staffs of both Motorola and Tandy to join us in our townwatch operations in the Overbrook and Overbrook Park sections of Philadelphia. Employees would be teamed with experience Patrol members so to experience first hand the situations faced and the related communications needs.

#### V. Need for Reduced Licensing Fees

The one area where the members of Suburban REACT agree with Motorola, and Tandy, is for the need for reduced licensing fees. Because of the personal nature of the



GMRS, it is unreasonable to expect a citizen to pay \$80 for a license. It is frustrating to ask a citizen volunteer to pay this expense so as to gain the privilege of helping the community. When a commercial business uses radio system to generate an income stream such a fee, spread over several (dozens of?) radios is reasonable for a license in the Business or SMR Services. However, given that the typical citizen will usually purchase only one or two radios, a more modest license fee would seem appropriate. The position advanced by REACT International would better meet the public interest.

*This is not to say that we advocate delicensing -- this is not the case. We feel it important that licensing be retained, and that a modest fee be required to make the citizen realize that the license is of value and thus the service should not be abused.*

#### VI. Need for Additional Communication Alternatives

In its Comments, REACT International correctly argues that the public, including community based service organizations, has needs for additional communication alternatives. Many of these needs can be met by application of modern technologies to existing services. For example, standardized selective calling and automatic trunking techniques should be agreed upon to provide a uniform format common to all users in services such as CB Radio and the GMRS.

Proposals for new radio services, such as PCS, should include discussion of the need for low power, low cost, short range capabilities. When the Commission was pursuing rulemaking for the now successful cellular telephone service it would have been possible to consider allocation of several channels for radio to radio communications without the requirement for use of the public switched telephone network. Such radio to

radio channels would have reduced the spectrum demand and the user costs for short distance, "car to car" or "person to person" communications.

## VII. CONCLUSION

While Suburban REACT agrees with Tandy, Motorola and REACT International as to the need for additional two-way radio alternatives for the general public, and local community service organizations, we agree with REACT International that the proposal set forth by Tandy fails to meet these needs in any great measure. On the contrary, the proposed FRS would fail to meet many of the needs for personal communications and, at the same time, could do harm to the service.

The members of Suburban REACT call on the Commission to dismiss the proposal for a Family Radio Service in RM-8499 and to proceed both with 1) the implementation of enhanced technologies in the Citizens Band and General Mobile Radio Services, and 2) the consideration of the need for low cost "person to person" communications when it conducts rulemaking activities in future radio services. Suburban REACT will be pleased to participate in further discussions.

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| Unit    | Total<br>92 | Total<br>93 | Jan | Feb | Mar | April | May | June | Total |
|---------|-------------|-------------|-----|-----|-----|-------|-----|------|-------|
| 12      | 6           | 0           |     |     |     |       |     |      | 6     |
| 15      | 12          | 3           |     |     |     |       |     |      | 15    |
| 20      | 0           | 67          | 14  | 15  | 16  | 21    | 19  | 15   | 166   |
| 22      | 379         | 370         | 14  | 12  | 32  | 28    | 24  | 17   | 876   |
| 23      | 2           | 0           |     |     |     | 2     |     |      | 4     |
| 26      | 6           | 0           |     |     |     |       |     |      | 6     |
| 29      | 471         | 520         | 44  | 14  | 51  | 40    | 45  | 9    | 1193  |
| 33      | 24          | 78          |     |     | 4   | 8     | 5   |      | 119   |
| 34      | 77          | 0           |     |     |     |       |     |      | 77    |
| 37      | 3           | 0           |     |     |     |       |     |      | 3     |
| 40      | 0           | 4           |     |     |     |       |     |      | 4     |
| 43      | 4           | 0           |     |     |     |       |     |      | 4     |
| 50      | 124         | 206         |     |     |     | 20    | 15  |      | 365   |
| 51      | 10          | 52          |     |     |     | 4     |     |      | 68    |
| 58      | 380         | 583         | 64  | 50  | 90  | 102   | 75  | 50   | 1394  |
| 69      | 67          | 72          |     |     |     |       |     |      | 139   |
| 71      | 59          | 5           |     |     |     |       |     |      | 64    |
| 72      | 13          | 0           |     |     |     |       |     |      | 13    |
| 73      | 50          | 5           |     |     |     |       |     |      | 55    |
| 74      | 5           | 0           |     |     |     |       |     |      | 5     |
| 84      | 184         | 351         | 64  | 15  | 75  | 70    | 45  | 35   | 839   |
| 96      | 6           | 0           |     |     |     |       |     |      | 6     |
| 108     | 73          | 20          |     |     |     |       | 4   |      | 97    |
| 109     | 71          | 20          |     |     |     |       | 4   |      | 95    |
| 110     | 13          | 0           |     |     |     |       |     |      | 13    |
| Deflice | 0           | 4           |     |     |     |       |     |      | 4     |
| 25      | 2035        | 2358        | 199 | 106 | 268 | 294   | 236 | 126  | 5621  |
|         | 26          | 26          | 5   | 5   | 6   | 9     | 9   | 5    |       |
| Ave hr  | 78          | 91          | 40  | 21  | 45  | 33    | 26  | 25   |       |

| Unit | Total<br>92 | Total<br>93 | Jan | Feb | Mar | April | May | June | Unit<br>Total |
|------|-------------|-------------|-----|-----|-----|-------|-----|------|---------------|
| 15   | 40          | 0           |     |     |     |       |     |      | 40            |
| 20   |             | 167         | 63  | 99  | 105 | 160   | 133 | 105  | 832           |
| 22   | 1349        | 2392        | 105 | 75  | 228 | 179   | 161 | 115  | 4604          |
| 29   | 144         | 918         | 112 | 42  | 203 | 135   | 169 | 51   | 1774          |
| 33   | 89          | 353         |     |     |     | 26    | 24  |      | 492           |
| 40   | 0           | 4.5         |     |     |     |       |     |      | 4.5           |
| 43   | 26          | 0           |     |     |     |       |     |      | 26            |
| 50   | 703         | 506         |     |     |     | 130   | 104 |      | 1443          |
| 51   | 50          | 105         |     |     |     | 22    |     |      | 177           |
| 69   | 127         | 0           |     |     |     |       |     |      | 127           |
| 71   | 171         | 14          |     |     |     |       |     |      | 185           |
| 73   | 100         | 0           |     |     |     |       |     |      | 100           |
| 74   | 12          | 0           |     |     |     |       |     |      | 12            |
| 84   | 668         | 1954        | 187 | 82  | 278 | 283   | 323 | 175  | 3950          |
| 96   | 44          | 0           |     |     |     |       |     |      | 44            |
| 109  | 411         | 88          |     |     |     |       |     | 14   | 513           |
| 110  | 26          | 0           |     |     |     |       |     |      | 26            |
| 17   | 3960        | 6501        | 467 | 298 | 814 | 935   | 914 | 460  | 14349         |
|      | 16          | 17          | 4   | 4   | 4   | 7     | 6   | 5    |               |
| Ave  | 248         | 382         | 117 | 75  | 204 | 134   | 152 | 92   |               |

# Official Commendation

## CITIZEN COMMENDATION

### POLICE DEPARTMENT Township of Lower Merion

**Mr. Kevin Dixon**  
1117 N. 66th Street  
Philadelphia, PA 19151

**Dear Mr. Dixon:**

On behalf of the citizens of Lower Merion Township and this police department, I wish to commend you for your prompt and decisive actions that assisted in an important arrest on Tuesday, April 12, 1994.

On that date, while on patrol as a member of Philadelphia's Community Watch, you became aware of a pursuit of several vehicles from this jurisdiction which were wanted for an auto theft. You and your partner, Mr. Joseph McClelland, immediately went toward the area of the pursuit.

Mr. McClelland and yourself observed an unmarked police vehicle following a lone male on a bicycle. The male subsequently abandoned the bicycle and climbed over a fence, fleeing on foot onto a golf course.

Leaving Mr. McClelland to direct police vehicles to the scene, you waited near the bicycle until an officer from this department arrived. Using a portable light to illuminate the area, you escorted the officer onto the golf course and assisted him in making an apprehension.

The male in custody was positively identified as the operator of the stolen vehicle and he was charged with the applicable crimes.

Your alertness and willing cooperation enabled this department to effect a timely resolution to this incident. Your actions reflect considerable credit upon you and the Community Watch organization and serve as a noteworthy example of the value of citizen contribution to law enforcement and the community.

  
Joseph P. Dixon  
Acting Superintendent of Police

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CERTIFICATE OF SERVICE

I, Edward W. N. Smith, do hereby certify that a copy of the foregoing Reply Comments in RM-8499 was mailed first class postage prepaid, to the below listed parties:

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September 8, 1994